

IN THE UNITED STATES DISTRICT COURT
OF CHATTANOOGA, TENNESSEE

SAMUEL HYRNCEWIZ,

Plaintiff,

vs.

Civil Action No.
1-24-cv-263

CITY OF JASPER,

and

OFFICER JUSTIN GRAHAM
IN HIS OFFICIAL AND PERSONAL
CAPACITY,

and

OFFICER DERRICK LONG
IN HIS OFFICIAL AND PERSONAL
CAPACITY,

Defendants.

Deposition of:

WILLIAM MASON

Taken on behalf of the Plaintiff
May 22, 2025

Commencing at 9:00 a.m. CST

ELIZABETH WHITE, RPR, LCR
Stenographic Court Reporter
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EXHIBIT

1 still suspended.

2 Q. Uh-huh.

3 A. And he's currently being -- been advised
4 by the POST Commission what I had done and what's
5 going on. So I'm waiting on the POST Commission
6 to get back with me to do their review on him.

7 Q. Okay.

8 A. Because I'm asking for -- do
9 certification.

10 Q. Okay. And then the one that resigned?

11 A. Michele.

12 Q. Michele. What's Michele's last name?

13 A. Lockhart.

14 Q. Okay. What did she -- what was the reason
15 for her --

16 A. She came to work and had been drinking.

17 Q. Okay.

18 A. So --

19 Q. It's frowned upon.

20 A. Very frowned upon.

21 Q. I guess, describe your role with respect
22 to oversight of the police officers.

23 A. Well, I mean, I do -- we don't actually
24 have internal investigating as far as affairs go.
25 So I oversee the officers. And if there are

1 misconduct seems, I suspend them. And if they
2 seem to be terminated, I ask the Board to
3 terminate them.

4 Q. Okay.

5 A. I review body camera footage. I review
6 the reports.

7 Q. Does anybody besides you review those
8 things?

9 A. Lieutenant Dykes does, but I'm the mainly
10 one that does it.

11 Q. Okay.

12 A. I'm too busy trying to keep him with POST
13 Commission -- keeping everything up with them.

14 Q. Do all the officers wear a body cam when
15 they're out in --

16 A. They do.

17 Q. Okay. And so, I think I know the answer
18 just based on the exhibit.

19 Who has the final policy-making authority
20 within the police department?

21 MR. WELLS: Object to form.

22 THE WITNESS: There's -- I don't
23 understand what you're saying.

24 BY MR. DAVIS:

25 Q. Okay. And great. You can -- so I guess

1 THE WITNESS: Nope.

2 BY MR. DAVIS:

3 Q. Okay. Again, with the policies, are
4 officers prohibited from striking a person in the
5 face or neck unless deadly force is justified?

6 A. No. It's compliance. The neck.

7 Q. Are officers trained in deescalation
8 techniques?

9 A. We are.

10 Q. Was Officer Graham disciplined for this
11 incident?

12 A. No, sir.

13 Q. Why not?

14 A. Because I didn't feel he done anything
15 wrong.

16 Q. So Officer Graham was not disciplined for
17 not immediately and courteously telling a
18 passenger why something was happening on 8/5/23?

19 A. No.

20 MR. WELLS: Object to form.

21 BY MR. DAVIS:

22 Q. And he -- Officer Graham was not
23 disciplined for unreasonable conduct during a
24 traffic stop on 8/5/23?

25 A. No, sir.

1 A. They're a grown adult. They're supposed
2 to read it.

3 Q. Okay.

4 A. They sign for it. I figured they read it.

5 Q. Okay. That's the only measure?

6 A. That's the only method.

7 Q. Okay. So, in theory, if I handed you this
8 and you signed the back of it and handed it back
9 to me, there's no -- that's the only way to know
10 that --

11 A. That's the only way.

12 MR. WELLS: Object to form.

13 BY MR DAVIS:

14 Q. That's the only way to know? Okay.

15 How are the officers trained on use of
16 force and deescalation policies?

17 A. Through in-service and the Academy.

18 Q. Anything additional to that?

19 A. No, sir.

20 Q. Do they receive scenario-based training on
21 handling intoxicated individuals?

22 A. They do.

23 Q. Is that through the Academy?

24 A. Academy and in-service.

25 Q. Okay. What's in-service?

1 A. Yearly schooling that we have to attend.

2 Q. Okay. That's through the -- I mean, the
3 State requires that, right?

4 A. Yes, sir.

5 Q. Okay.

6 A. POST does, yes, sir.

7 (Reporter communication.)

8 BY MR. DAVIS:

9 Q. So we talked about internal review.

10 Did this lead to any remedial training?

11 MR. WELLS: Object to form.

12 THE WITNESS: No.

13 BY MR DAVIS:

14 Q. Any policy updates?

15 A. No, sir.

16 Q. Have there been previous complaints
17 involving excessive force with Officer Graham?

18 A. Not that I'm aware of.

19 Q. You're not aware of three prior lawsuits
20 that were filed?

21 MR. WELLS: Object to form.

22 THE WITNESS: Not with Officer
23 Graham.

24 BY MR DAVIS:

25 Q. Okay. What about Officer Long?